

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE  
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT  
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

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Dated: January 18, 2019

**EXHIBIT A – ZONIES LAW**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:16-cv-06131	Betsy Gray and Darrell Gray v. C.R. Bard, Inc., et al.

**EXHIBIT B – WAGSTAFF & CARTMELL**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-cv-01828	Stacey Challis v. C.R. Bard, Inc., et al.
2:13-cv-05994	Eve Tibone and John Byers v. C.R. Bard, Inc., et al.
2:13-cv-12069	Debbie Knight v. C.R. Bard, Inc., et al.
2:13-cv-16507	Rebecca McCormick and Leo McCormick v. C.R. Bard, Inc., et al.
2:13-cv-19144	Camille Louise Burditt and Charles N. Burditt v. C.R. Bard, Inc., et al.
2:13-cv-20250	Connie Bailey and C.R. Bard, Inc., et al.
2:13-cv-20409	Vicki Hoover v. C.R. Bard, Inc., et al.
2:13-cv-21805	Christine Perry v. C.R. Bard, Inc., et al.
2:13-cv-23669	Susan Njirich and David Njirich v. C.R. Bard, Inc., et al.
2:14-cv-25600	Michele Hartzell and Dan Hartzell v. C.R. Bard, Inc., et al.
2:15-cv-11189	Joyce L. Bailey and Charles Bailey v. C.R. Bard, Inc., et al.
2:16-cv-08845	Jacqueline Miller v. C.R. Bard, Inc., et al.
2:16-cv-12669	Helen Chanay v. C.R. Bard, Inc., et al.
2:17-cv-02843	Rahna Autrey and Jerry Autrey v. C.R. Bard, Inc., et al.
2:17-cv-02924	Carmen Droin v. C.R. Bard, Inc., et al.

**EXHIBIT C – TOR HOERMAN LAW**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-cv-31320	Geri Kempa and Paul Kempa v. C.R. Bard, Inc., et al.
2:17-cv-02265	Kimberly Schubert v. C.R. Bard, Inc., et al.

**EXHIBIT D – BERTRAM & GRAFF**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-cv-23761	Nancy Berry and Steven Berry v. C.R. Bard, Inc., et al.
2:13-cv-32971	Pearl Conro and Dale Conro v. C.R. Bard, Inc., et al.

**EXHIBIT E – PETERSON & ASSOCIATES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-cv-20032	Myra Denton v. C.R. Bard, Inc., et al.



**EXHIBIT F – PHILLIPS LAW OFFICES**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-cv-01976	Brenda L. Hughes and Ronnie Hughes v. C.R. Bard, Inc., et al.

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.